

Protestants and other carriers of customers and to divert revenues which are essential to the maintenance of an adequate and safe transportation system.

4. Applicant does not possess the technical and financial ability to provide the proposed service and lacks a propensity to operate safely and legally and, therefore does not have the fitness to be granted a Certificate of Public Convenience by your Honorable Commission, specifically:
 - a. Applicant has not shown or demonstrated that it has the pertinent equipment and vehicles for the proposed service.
 - b. Applicant has not shown or demonstrated that it possesses the pertinent safety program for the proposed service or that it will be able to obtain a satisfactory safety rating.
 - c. Applicant has not shown or demonstrated that it has pertinent financial wherewithal to operate the proposed service. He has only \$40,000 in cash on hand.
 - d. Applicant has not shown or demonstrated that it has a minimum of two (2) years experience with a licensed household goods carrier or the equivalent for successful new operations.
 - e. Applicant has failed to maintain records of his operations which have occurred in violation of his Application.
 - f. Applicant has not complied with insurance requirements.

Respectfully submitted,



By: WILLIAM H. R. CASEY, ESQUIRE

Attorney for Protestants

99 East Court Street

Doylestown, PA 18901

215 348 7300

caseyesq@verizon.net

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MAR 23 2026 AM 11:22

VERIFICATION

I, WILLIAM H.R. CASEY hereby verify that the statements made in the foregoing document are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: 3-19-24

William H.R. Casey

LIAN'S MOVERS, LLC

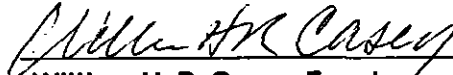
A-2026-3060275

CERIFICATE OF SERVICE

I certify that I have this day served a true copy of my Protest on the following by First Class mail:

LIAN'S MOVERS, LLC
4031 KILMER AVENUE
ALLENTOWN, PA 18104

Date: This day 19th of MARCH, 2026.



William H. R. Casey, Esquire

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CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the United Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: WILLIAM H.R. CASEY, Esquire

Signature: *William H.R. Casey 3/19/26*

Name: WILLIAM H.R. CASEY, Esquire

Attorney I.D. (if applicable) 12189

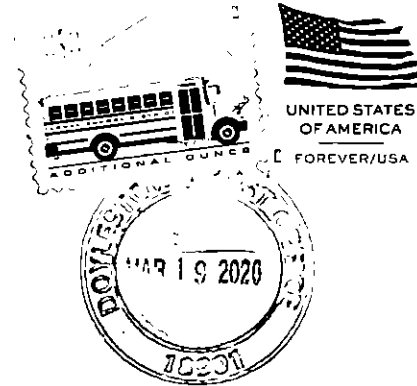
WILLIAM H. R. CASEY

ATTORNEY AT LAW

99 EAST COURT STREET

DOYLESTOWN, PENNSYLVANIA 18901

Secretary
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120



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